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*Attorneys for Defendant*  
*BAM Trading Services Inc.*

[Additional Counsel on Signature Page.]

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF ARIZONA**  
**PHOENIX DIVISION**

Ryan Cox, individually and on behalf of all  
others similarly situated,

Plaintiff,

v.

CoinMarketCap OpCo, LLC, Binance  
Capital Management Co., Ltd. d/b/a  
Binance and Binance.com, BAM Trading  
Services Inc. d/b/a Binance.US, Changpeng  
Zhao, Catherine Coley, Yi He, Ted Lin, and  
Does I-X,

Defendants.

Case No. CV-21-08197-PCT-SMB

**JOINT STIPULATION FOR  
SCHEDULING ORDER**

1 Plaintiff Ryan Cox (“Plaintiff”) and Defendants CoinMarketCap OpCo, LLC,  
2 Binance Capital Management Co., Ltd., and BAM Trading Services Inc. (collectively, the  
3 “Corporate Defendants” and, together with Plaintiff, the “Parties”), by and through their  
4 undersigned counsel of record, respectfully submit this Joint Stipulation for Scheduling  
5 Order, as follows:

6 WHEREAS, on September 13, 2021, Plaintiff filed a putative class action  
7 complaint (the “Complaint”) in the above-referenced action (the “Action”);

8 WHEREAS, as of the date hereof, Plaintiff has not completed service of the  
9 Complaint on Defendants Changpeng Zhao, Catherine Coley, Yi He, and Ted Lin  
10 (together, the “Unserved Defendants”);

11 WHEREAS, counsel for the Parties having conferred regarding a schedule for  
12 responding to the Complaint, the Parties agree that a coordinated briefing schedule for any  
13 motion(s) to dismiss will best facilitate the just and efficient progress of the Action and  
14 use of this Court’s and the Parties’ resources; and

15 WHEREAS, the Parties have not previously requested any extensions.

16 NOW, THEREFORE, the Parties hereby stipulate and agree, subject to the Court’s  
17 approval, as follows:

18 1. The deadline for the Corporate Defendants to respond to the Complaint shall  
19 be sixty (60) days after the date that service of the Complaint upon all Unserved  
20 Defendants has been perfected; and

21 2. Should any of the Corporate Defendants move to dismiss the Complaint,  
22 Plaintiff shall file his opposition(s) to the motion(s) to dismiss within sixty (60) days of  
23 the filing of the motion(s) to dismiss; and the Corporate Defendants shall file reply  
24 brief(s) within thirty (30) days of the filing of Plaintiff’s opposition(s).

25 3. The Corporate Defendants do not waive any of their respective rights and  
26 defenses, including, without limitation, any and all jurisdictional, venue, or forum-related  
27 rights and defenses, by agreeing to and/or filing this Joint Stipulation for Scheduling  
28 Order.

1                   **IT IS SO STIPULATED.**

2           Dated: November 3, 2021

By: /s/ Daniel Roeser

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13           Dated: November 3, 2021

By: /s/ Alexander Kolodin (with permission)

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23           Dated: November 3, 2021

By: /s/ Karen King (with permission)

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1  
2 Dated: November 3, 2021

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**CERTIFICATE OF SERVICE**

I hereby certify that on November 3, 2021 a copy of the foregoing was filed electronically using the Clerk of Court's CM/ECF system, which will provide notice to all counsel of record.

/s/ Daniel Roeser  
DANIEL ROESER